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MOT. TO EXTEND WORD LIMIT FOR PET.'R'S REPLY & ORDER - 1 Case No. 2:23-cv-01592-RSL-MJP

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON

Emmanuel ASHEMUKE,

Petitioner,

v.

ICE FIELD OFFICE DIRECTOR,

Respondents.

Case No. 2:23-CV-01592-RSL-MJP

MOTION TO EXTEND WORD LIMIT FOR PETITIONER'S REPLY AND ORDER

Pursuant to Local Civil Rule 7(f), Mr. Ashemuke respectfully requests that the Court grant an extension of the word limit for his reply in support of a motion to enforce and for a temporary restraining order. The reply is due on August 2, 2024. *See* Dkt. 48. Counsel for Mr. Ashemuke has conferred with Michelle Lambert, counsel for Respondent, and Respondent has taken no position on this request.

Good cause exists for this request. Until Monday, July 22, 2024, Mr. Ashemuke was proceeding pro se in this case. While proceeding pro se, the Court ordered the government to administer a bond hearing that comports with the requirements of *Singh v. Holder*, 638 F.3d 1196 (9th Cir. 2011). Dkt. 29. Mr. Ashemuke has since filed a motion for a temporary restraining order, *see* Dkt. 42, and a motion to enforce, *see* Dkt. 38, the briefing for which this Court has now consolidated, *see* Dkt. 48. On July 8, 2024, this Court issued an order explaining that it would "benefit from the government's input regarding the jurisdictional issues raised in

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1 petitioner's motion to recharacterize, the scope of any judicial review in these circumstances, and 2 the substantive issues that are within the Court's purview." Dkt. 42. 3 Given that Mr. Ashemuke was previously proceeding pro se in this matter, counsel would 4 appreciate the opportunity to address fully these issues and the merits of Mr. Ashemuke's 5 motions. The issues presented in the Court's order requesting the government's views are 6 complex. As an attorney with the Northwest Immigrant Rights Project, counsel regularly 7 represents individuals in habeas corpus proceedings, and believes the Court would benefit by 8 allowing Mr. Ashemuke's counsel to supplement his previous, pro se filings to ensure that the 9 Court has a full picture of the relevant law before making any decision. 10 For these reasons, Mr. Ashemuke respectfully requests that the Court extend the word 11 limit for his reply to 7,000 words. 12 Dated this 24th day of July, 2024. 13 Respectfully submitted, 14 s/ Aaron Korthuis Aaron Korthuis 15 aaron@nwirp.org 16 NORTHWEST IMMIGRANT RIGHTS PROJECT 615 Second Avenue, Suite 400 17 Seattle, Washington 98104 (206) 816-3872 18 19 20 21 22 23 24

MOT. TO EXTEND WORD LIMIT FOR PET.'R'S REPLY & ORDER - 2 Case No. 2:23-cv-01592-RSL-MJP

NORTHWEST IMMIGRANT RIGHTS PROJECT 615 2nd Ave Ste. 400 Seattle, WA 98104 Tel: 206-816-3872

1 **ORDER** 2 Before the Court is the Petitioner's Motion to Extend Page Limits for the Petitioner's 3 Reply in Support of a Motion for Temporary Restraining Order and Motion to Enforce. The 4 Court finds that good cause exists to extend the page limits for the reply, and accordingly ORDERS that the word limit for the reply is set at 7,000 words. 5 6 Dated this 25th day of July, 2024. 7 8 MMS (asuik Robert S. Lasnik 9 United States District Judge 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 MOT. TO EXTEND WORD LIMIT FOR